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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Eugene

KATHLEEN STREK,

**CV. 6:12-cv-01610-HO**

Plaintiff,

v.

THE HUMANE SOCIETY OF THE UNITED  
STATES,

**MOTION TO DISMISS AND/OR  
FOR SUMMARY JUGMENT**

Defendant.

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**LOCAL RULE 7.1 CERTIFICATE**

The undersigned certifies that counsel for Defendant The Humane Society of the United States conferred with Plaintiff's counsel before filing this motion but that Plaintiff's counsel has not stated his position so the parties were unable to resolve their differences of opinion prior to filing this motion.

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**MOTION**

Defendant, The Humane Society of the United States (the "HSUS"), by its undersigned attorneys, hereby moves this Court to dismiss and/or grant summary judgment to Defendant on Plaintiff's OSHA Whistleblowing Claim. The grounds for this motion are set forth in the accompanying memorandum of points and authorities.

In support of this motion, Defendant relies upon the pleadings herein, the rules of this Court, the points and authorities identified and discussed in the Memorandum of Points and Authorities in Support of Motion to Dismiss and/or for Summary Judgment, the Declaration of Karla Grossenbacher in Support of Motion to Dismiss and/or for Summary Judgment, and the Declaration of Amy L. Angel in Support of Motion to Dismiss and/or for Summary Judgment filed herewith.

DATED this 14th day of September 2012.

BARRAN LIEBMAN LLP

By s/Andrew M. Schpak  
Andrew M. Schpak, OSB No. 04408  
aschpak@barran.com

SEYFARTH SHAW LLP

Karla Grossenbacher, Motion for Admission Pro  
Hac Vice Pending

Attorneys for Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of September 2012, I served the foregoing **MOTION TO DISMISS AND/OR FOR SUMMARY JUGMENT** on the following parties at the following addresses:

Glenn N. Solomon  
1001 SW 5th Ave., #1414  
Portland, Oregon 97204

By causing the same to be:  mailed  electronic filing using the Court's ECF System  
 hand delivered  faxed to them a true and correct copy thereof.

*s/Andrew M. Schpak*  
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Andrew M. Schpak

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